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BY ECF

Honorable Raymond J. Dearie
Senior U.S. District Judge
U. S. District Courthouse
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Bebars Baslan
Docket No. 13 CR 220 (RJD)

Dear Judge Dearie:

At the request of my client Bebars Baslan, I respectfully request the Court to direct the government to cease from any further computer scanning until a hash scan is implemented and the integrity of encrypted files is safeguarded. A number of computer devices and external hard drives were seized from my client's apartment last march when he was arrested. There are a encrypted files in the computer and external hard drive memories that are essential to the defense of this case.

I have attached as part of this application an explanation of the computer requirements of the requested hash scan and the reason for our request. I ask the Court to consider this application and to entertain oral argument as to its merits at the upcoming court conference on September 13. In the interim, we are withdrawing Baslan's application to submit pro se motions.

I thank the Court for your courtesy and consideration, and convey my best wishes for a good holiday weekend.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Ephraim Savitt" followed by a stylized flourish or initials.

Ephraim Savitt, Esq.

Encl.

Cc: All counsel (By ECF)